

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(b)	
FOX ROTHSCHILD LLP 49 Market St. Morristown, NJ 07960 Joseph J. DiPasquale, Esq. Michael R. Herz, Esq. Joseph A. Caneco, Esq. jdipasquale@foxrothschild.com mherz@foxrothschild.com jcaneco@foxrothschild.com Telephone: (973) 992-4800 Facsimile: (973) 992-9125 <i>Proposed Counsel to the Debtor And Debtor in Possession</i>	
In re:	
ASSUNCAO BROS., INC.,	Chapter 11 (Subchapter V)
Debtor.	Case No. 22-16159
	Judge:

**APPLICATION FOR EXPEDITED CONSIDERATION
OF FIRST DAY MATTERS**

On August 3, 2022, Assuncao Bros., Inc. (the “Debtor”), filed a petition for relief under chapter 11, subchapter V of the Bankruptcy Code.

Pursuant to D.N.J. LBR 9013-5, proposed counsel for the Debtor requests that the following relief be provided on a first day basis, on:

1. ■ Debtor’s Motion for Entry of an Order (i) Authorizing the Continued Use of (a) Existing Cash Management System and (b) Existing Bank Accounts and Business Forms; (ii) Providing the United States Trustee with a 60-day Objection Period; and (iii) Granting Related Relief
2. ■ Debtor’s Motion for Entry of an Order Authorizing the Debtor to Pay and Honor Prepetition Employee Wages, Salaries, Benefits, Expenses, and Other Obligations

3. ■ Debtor's Motion for Entry of Interim and Final Orders (i) Authorizing (a) Post-Petition Financing and (b) Use of Cash Collateral; (ii) Modifying the Automatic Stay; and (iii) Scheduling a Final Hearing
4. ■ Debtor's Motion for Order Pursuant to Bankruptcy Rule 1007(c) Granting Additional Time for Filing Schedules of Assets and Liabilities, Statement of Financial Affairs, and Schedules of Executory Contracts and Unexpired Leases

DATED: August 3, 2022

Respectfully submitted,

FOX ROTHSCHILD LLP

Proposed Counsel for Debtor and Debtor-in-Possession

By: /s/ Joseph J. DiPasquale
Joseph J. DiPasquale, Esq.